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5 *And Greyhound Lines, Inc.*

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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 SHAWNA PETERS, an Individual, 10 11 Plaintiff, 12 13 vs. 14 LARRY SAMPSON, an Individual, 15 GREYHOUND LINES, INC., a Foreign Corporation, and DOES I-X, unknown persons, ROE BUSINESS ENTITIES I-X, inclusive, 16 Defendants.	CASE NO.
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17 **NOTICE OF REMOVAL**

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19 PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §§ 1332, 1441 and 1446, Defendants,
20 LARRY SAMPSON and GREYHOUND LINES, INC. (collectively the “Defendants”), by and
21 through their counsel of record, LEWIS BRISBOIS BISGAARD & SMITH LLP, hereby remove
22 to this Court the action in the Eighth Judicial District Court of Clark County, Nevada described
23 below, and in support of same, state as follows:

24 1. On September 13, 2017, Plaintiff SHAWNA PETERS, filed an action entitled, *Peters v.*
25 *Sampson; Greyhound Lines, Inc.*, in the Eight Judicial District Court of the State of Nevada In and
26 For the County of Clark, Case No. A-17-761455-C. A true and correct copy of the Complaint in
27 this action is attached hereto as Exhibit “A.”
28

1 2. The Defendants were served with the Summons and Complaint on or about September 22,
2 2017. A true and correct copy of the Service of Process Transmittal is attached hereto as Exhibit
3 “B.”

4 3. Removal is appropriate pursuant to 28 U.S.C. § 1441(b), because this is a civil action over
5 which this Court has original jurisdiction under 28 U.S.C. 1332(a)(1). Additionally, the action is
6 removable by the Defendants pursuant to 28 U.S.C. § 1441(b).

7 4. This is an action between citizens of different states. In particular, Plaintiff is a resident of
8 Clark County, Nevada. Defendant LARRY SAMPSON is a resident of Amarillo, Texas.
9 Defendant GREYHOUND LINES, INC. is a Delaware corporation with a principal place of
10 business in Dallas, Texas. Hence, complete diversity exists between the parties.

11 5. This matter involves a dispute concerning personal injuries and, based upon the allegations
12 in Plaintiff’s Complaint and past communications between Plaintiff’s counsel and the third-party
13 administrator for Defendant GREYHOUND LINES, INC., the amount in controversy exceeds the
14 jurisdiction sum of \$75,000.00, exclusive of interest and costs.

15 6. All of the Defendants, which are represented by LEWIS BRISBOIS BISGAARD &
16 SMITH LLP, consent to removal of this matter.

17 7. This Notice of Removal is timely because it is being filed within thirty (30) days of service
18 of the Complaint, as required by 28 U.S.C. § 1446(b).

19 8. No further proceedings have been had in the state court action.

20 9. The United States District Court for the District of Nevada embraces the place where the
21 Eighth Judicial District Court of the State of Nevada In and For the County of Clark is located.
22 Thus, venue for removal purposes is proper in this Court under 28 U.S.C. § 1441(a).

23 10. Defendants reserve all rights, including defenses and objections, as to venue, personal
24 jurisdiction, and service, and the filing of this Notice of Removal is subject to and without waiver
25

1 of any such defenses and objections.

2 11. The action in the State Court was not commenced more than one year before the date of
3 this removal.

4 12. No previous request has been made for the relief requested herein.

5 13. Pursuant to 28 U.S.C. § 1446(d), a copy of this Notice of Removal is being served on
6 counsel for Plaintiff, SHAWNA PETERS, and a copy is being filed with the Clerk of the Eighth
7 Judicial District Court in Clark County, Nevada.
8

9 WHEREFORE, for the reasons set forth above, Defendants remove this action, which is
10 currently pending in the Eight Judicial District Court, Clark County, Nevada as Case No. A-17-
11 761455-C.

12 DATED this 23rd day of October, 2017

13 LEWIS BRISBOIS BISGAARD & SMITH LLP
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15

16 By /s/ Marc S. Cwik

17 MARC S. CWIK

18 Nevada Bar No. 006946

19 6385 S. Rainbow Boulevard, Suite 600

20 Las Vegas, Nevada 89118

21 *Attorneys for Defendants*
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of LEWIS BRISBOIS BISGAARD & SMITH LLP and that on this 23rd day of October, 2017 I did cause a true and correct copy of **NOTICE OF REMOVAL** to be served via the Court's electronic filing system CM/ECF to the following:

Preston Rezaee, Esq.
THE FIRM, P.C.
630 South Third Street
Las Vegas, Nevada 89101
Attorneys for Plaintiff

By /s/ Misty Humphrey
An Employee of
LEWIS BRISBOIS BISGAARD & SMITH LLP